



ZACHARY CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JENNIFER SCHUMAN
Special Assistant Corporation Counsel
phone: (212) 356-3518
fax: (212) 356-3558
email: jschuman@law.nyc.gov

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BY ECF

Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Mikhail Markman v. City of New York, 13-cv-6843 (BMC)

Dear Judge Cogan:

I am the Special Assistant Corporation Counsel in the Office of Zachary Carter, Corporation Counsel of the City of New York representing defendants The City of New York and Police Officer Jessi D'Ambrosio in the above-referenced matter. Defendants write to oppose the plaintiff's filing of an amended complaint today, and ask the Court to deny the filing of said amended complaint in that the filing is untimely.

At a hearing held before Your Honor on May 27, 2014, more than 5 weeks ago, counsel was given leave to amend the complaint and the undersigned consented. Counsel however never did, although there appears to be no reason whatsoever for the delay. Meanwhile, depositions have been conducted and completed as of June 20, 2014 and the undersigned has drafted and is preparing to file this evening a pre-motion conference letter regarding defendants' anticipated summary judgment motion. That letter is due no later than tomorrow and a Final Pretrial Conference has been scheduled by the Court for July 22, 2014.

Defendants therefore respectfully request that plaintiff's filing of an amended complaint at this late date be denied.

Respectfully,


Jennifer Schuman
Special Assistant Corporation Counsel

Cc: By ECF: Ameer Benno, Esq., Paris Santiago Jr, Esq., Ed Sivin, Esq.